

September 19, 2011

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Permitted Oral *Ex Parte* Presentation  
WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135; WC Docket No. 05-337;  
CC Docket No. 01-92; CC Docket No. 96-45 and WC Docket No. 03-109

Dear Ms. Dortch:

Representatives of the State of Alaska (“Alaska”) met with Commission officials last week to discuss the intercarrier compensation and universal service fund (“USF”) proceedings, the docket numbers for which are listed above. Attending the meetings on behalf of the State were Jim Kohler, Deputy Director, Enterprise Technology Services, Department of Administration, State of Alaska and Russ Kelly, Associate Director, Office of Governor Sean Parnell, State of Alaska. The Alaska representatives met on September 14, 2011 with Margaret McCarthy, Policy Advisor for Commissioner Michael J. Copps, and in a separate meeting with Sharon Gillett and Joseph Cavender of the Wireline Competition Bureau. The Alaska representatives met on September 15, 2011 with Christine Kurth, Policy Director and Wireline Counsel for Commissioner Robert McDowell and on September 16, 2011 with Angela Kronenberg, Wireline Legal Advisor for Commissioner Mignon L. Clyburn.

During the meetings the Alaska representative explained that USF reform should not alter Alaska’s full Tribal Lands exemptions until the long term Connect America Fund can be developed to support adequately Alaska’s on-going high cost demands for both telecommunication and broadband service and expansion across its rural areas. It was also explained that USF reform must include support for middle mile expansion for Alaska because, absent adequate middle mile support, broadband expansion will not occur. It was further explained that USF reform must not diminish current state regulatory authority and oversight of intrastate rate policies and USF delivery through eligible carriers. In addition,

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USF reform must not penalize Alaska and other states that have already implemented ICC reform by reducing USF revenues or increasing local end user monthly fees.

Please contact the undersigned, at 1-202-624-5988, if you have any questions about this filing.

Sincerely,

Russ Kelly  
Associate Director  
State of Alaska  
Office of the Governor